ROLM
A Siemens Company

DOCKET FILE COPY ORIGINAL

RECEIVED
JAN 13 1994
FCC MAIL ROOM

January 11, 1994

Office of the Secretary
Att: Ms. Donna Searcy
Federal Communications Commission
1919 M Street, NW
RM. 222
Washington, DC 20554

Subject: GEN Docket 90-314
Reply Comments on Reconsideration Requests
Unlicensed PCS

Dear Ms. Searcy,

ROLM is submitting the enclosed reply comments (1 original, 9 copies) relating to the comments on the Petitions for Reconsideration - Unlicensed PCS , GEN. Docket 90-314. We would like these comments to be considered during the Commission's deliberations.

Sincerely,
ROLM, A Siemens Company

Peter Kozdon
Manager,
System Architecture

Enc. 10

4900 Old Ironsides Drive
PO Box 58075
Santa Clara, CA 95052-8075
Tel 408-492 2000
Fax 408-492 3430

No. of Copies rec'd 0+9
List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	GEN. Docket 90-314
Amendment of the Commission's	)	
Rules to Establish New Personal	)	
Communications Services	)	

Reply Comments of ROLM Company
on the
Petitions for Reconsideration - Unlicensed PCS

ROLM Company ("ROLM") hereby submits its reply comments on the above matter now before the Federal Communications Commission (FCC). As a major U.S. manufacturer of private business exchange (PBX) systems, ROLM believes it can assist the FCC by providing this perspective on comments submitted by others.

Isochronous Band Segmentation

ROLM is a member of WINForum and whole heartily supports the concept of industry consensus. However, on the matter of segmentation of the isochronous bands, ROLM disagrees with WINForum that industry consensus has been reached.[1] Segmentation was introduced as a concept early in the development of the WINForum Spectrum Etiquette ("Etiquette"). Since then, many companies have realized that this concept is flawed and have proposed that it be removed from the Etiquette. These efforts

[1] Wireless Information Networks Forum Comments on Petitions for Reconsideration (filed January 3, 1994) ["WINForum Comments"], p.3.

have at times been blocked in committee and at other times deliberately ignored by the WINForum Board.[2]

WINForum asserts that the Etiquette ensures "a level playing field for all companies,"[3] although they simultaneously admit that it excludes the deployment of the "proprietary technologies" of some companies.[4] These two assertions by WINForum are mutually exclusive. The exclusion of proprietary technologies contradicts the stated objective of the FCC to foster new technologies. The FCC should not support any artificial restrictions on the development of new technologies, and should therefore eliminate segmentation in the isochronous bands. It should also be noted that the term "proprietary" is somewhat presumptuous, as there is at present no standard for products in the UPCS band; all products within the band will be proprietary.

We agree with Apple that the WINForum Etiquette is unfairly biased toward "CT2", FDMA-type technologies.[5] ROLM continues to agree with Apple and others that FCC should remove segmentation from both the isochronous bands, or at least that the more flexible 5 MHz, lower isochronous band scheme be extended into the upper isochronous band.[6]

Power Limit for Licensed PCS Base Stations

ROLM supports Apple's proposal regarding the 2 watt EIRP restriction of licensed PCS base stations and mobile or portable devices in the 5 MHz portions of the spectrum adjacent to either side of the UPCS band.[7]

The requested 1000 (or even 1600) watt EIRP level for base stations has significant potential to disrupt services in the UPCS band. Northern Telecom, in its

---

[2] Comments of Apple Computer, Inc. (filed January 3, 1994) ["Apple Comments"], p.5, n.11.
[3] WINForum Comments, p.3.
[4] *Id.*
[5] Apple Comments, p.6.
[6] Apple Comments, p.6; Comments by Ominipoint Corporation, Inc. (filed January 3, 1994), p.8; Opposition of The Ericsson Corporation to Petitions for Reconsideration (filed December 30, 1993), p.3.
[7] Apple Comments, p.4.

comments, has shown that an increase in the EIRP from 100 to 1600 watts will result in an approximate 15% increase in interference to licensed, point-to-point microwave links.[8] UPCS devices are generally omnidirectional and operate at a significantly lower power level than point-to-point links. They are therefore more vulnerable to interference from these high power transmissions. ROLM agrees with Apple that these high power transmitters pose a serious threat to the successful deployment of devices in the UPCS spectrum.[9]

ROLM requests that the FCC limit the potential for interference by either restricting the power level in the spectrum adjacent to the UPCS band or by geographically restricting the location of the high power base stations to low population, rural areas.

Respectfully Submitted:

Peter Kozdon
Manager, System Architecture

ROLM, a Siemens Company
4900 Old Ironsides Dr.
Santa Clara, CA 95052-8075
408-492-3563

January 11, 1994

[8] Comments on the Petitions for Reconsideration by Northern Telecom, Inc. (filed December 30, 1993), p.4.
[9] Apple Comments, p.4.